

November 14, 2016

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

**Re: Post-Incentive Auction Transition Scheduling Plan, MB Docket No. 16-306;
GN Docket No. 12-268**

Dear Ms. Dortch:

Word of God Fellowship, Inc. (hereinafter, "Word of God Fellowship") a Georgia 501(c)(3) non-profit corporation d/b/a The Daystar Television Network (www.daystar.com) wishes to briefly submit these comments concerning the Post-Incentive Auction Transition Scheduling Plan, proposed by the Federal Communications Commission's Incentive Auction Task Force and Media Bureau (FCC).

The proposed plan as currently outlined to be accomplished within a 39 month deadline period is inflexible and provides no provisions for which broadcasters, manufacturers, vendors, tower owners, installation crews and various others have taken into consideration for years, including but not limited to the Analog to Digital transition. These past considerations which are still very current distilled to simple points and by no means a complete list as follows:

1. **Finances:** Some broadcasters may ask themselves whether they can afford to transition. The small business owner-broadcaster, will be reimbursed, but may not have or afford any monies for pre-reimbursement expenses. A loan or other ways of securing pre-reimbursement funds may take a substantial portion of time away from the "building" portion of allotted time within a phase. Even with a definitive list of reimbursements, due to the collusion rules currently enforced, a small broadcaster will find it difficult to negotiate for monies to accomplish the transition without being able to elaborate on specifics.
2. **Equipment Supply and Delivery Scheduling:** Many manufacturers insist that they will be able to meet the demand of this national transition (repack), however the Post-Incentive Auction Transition Scheduling Plan does not take into consideration if the manufacturing industry related to Broadcast can truly

keep up with demand and scheduling. A delay in a delivery of a few days can cause issues with tower owners and those involved with the actual installation of the late item. A single broadcaster may have a single station to move but, the tower owner may have several to move involving more than one tower crew. All on their own schedule. The Post-Incentive Auction Transition Scheduling Plan does not consider the “log jams” that may happen.

3. **Impact to other services:** The majority of television station transmitter sites are located on structures that are also locations for other services that co-locate transmitting equipment and antennas in close proximity to each other. Notice will have to be given and be made to other services such as, FM, Land Mobile, Wireless, LPFM, LPTV and Governmental (both Federal and Local jurisdictions), to name a few in order to coordinate an antenna move or a tower alteration. The Transition Scheduling Plan does not state who will be financially responsible, for example, if a single or perhaps numerous FM radio stations at a single tower must be temporarily relocated or have to shut down for periods of time due to the logistics (RF exposure of workers, one antenna or feed line is in the way or must be rerouted) of moving or changing an antenna(s). Word of God Fellowship contends that eventually the cost may be passed to the broadcaster in such ways as higher lease rates or in the cost of antenna installation.
4. **The Mechanics of Construction:** Various stations during the transition may have a simple transition, only an antenna and mask filter replacement. Or even possibly stay as they are. There are others that will have to change much more. The extreme would be transmitter, antenna, mask filter and perform a tower upgrade. This extreme will have to happen while ten's or a hundred stations are transitioning simultaneously. Not all broadcasters are alike.

Word of God Fellowship does agree with other commenters that a phased plan can work if the plan is modified and includes various safety nets. The plan must have in place provisions for those that can provide to the FCC rationale for delays and also provisions/extensions for those truly unpredictable circumstances of delay such as weather or disaster. Also, any extensions or waivers must be able to extend beyond the 39 month transition period or any particular phase period that a broadcaster is assigned. Word of God Fellowship contends that this should be written and finalized within the plan and not be postponed or regulated to the unspecified being determined on a case-by-case basis.

Word of God Fellowship also contends that the FCC, within the proposed Post-Incentive Auction Transition Scheduling Plan, has not considered the overall impact to the LPTV service or any other service. There are no provisions for an LPTV station to be off-air for longer than a year without the LPTV station's license being cancelled. There are no mentions of LPTV television translators that in essence are extensions to Full-Power

stations supplying coverage to the public that are contour obstructed or in fringe areas and receive television broadcast services only by translator.

The Post-Incentive Auction Transition Scheduling Plan is a good attempt to organize the upcoming transition. However, it fails to take into consideration not only what Word of God Fellowship has outlined but has not included within the plan any input from other services as to the effect this plan have on them. The plan fails as put forth; it is based on a "perfect world" concept of construction, economics, manufacturing and nature (weather or disaster). Every broadcast television station will have its own issues in one form or another not only from the short list that we have provided, but from the examples of other commenters of this plan.

To conclude this commentary, Word of God Fellowship, humbly presents the FCC and asks for adoption within the plan of the following:

1. Relieve the broadcasters of the anti-collusion rules, in order to preplan not only with manufactures for equipment, but with those who will install the equipment, own or manage towers, and those who will engineer these new facilities.
2. Officially inform the broadcasters of their "potential new channel" and update the broadcaster accordingly if there are any changes.
3. Officially take into account other service that may be forced off the air for an extended period or all together forced off the air. For example the LPTV has not lost its Right of Displacement (from a filing point of view), however when displacement (used as a verb) occurs, they de facto have lost their channel as no channel will be left. What good is the right to file if there is nothing which to file for? We ask that any plan that is presented be inclusive of all services existing within the current broadcast bands (VHF-L, VHF-H, and UHF).

Respectfully submitted,



Henry Turner
Director of Engineering
Daystar Television Network